

001-11-11-01-05

001-11-11-01-05

UNITED STATES DISTRICT COURT

DISTRICT OF NEW MEXICO

NEW MEXICO EDUCATIONAL  
RETIREMENT BOARD, NEW MEXICO  
PUBLIC EMPLOYEES RETIREMENT  
ASSOCIATION and NEW MEXICO STATE  
INVESTMENT COUNCIL,

Plaintiffs,

vs.

AOL TIME WARNER INC., AMERICA  
ONLINE, INC., TIME WARNER INC.,  
STEPHEN M. CASE, GERALD M. LEVIN,  
RICHARD D. PARSONS, KENNETH J.  
NOVACK, ROBERT W. PITTMAN, J.  
MICHAEL KELLY, STEPHEN F.  
BOLLENBACH, WAYNE H. PACE,  
STEVEN RINDNER, DAVID M. COLBURN,  
ERIC KELLER, JOSEPH A. RIPP, BARRY  
M. SCHULER, PASCAL DESROCHES,  
JOHN P. TULI, MYER BERLOW, PAUL T.  
CAPPUCCIO, CITIGROUP GLOBAL  
MARKETS, INC., CITIGROUP INC.,  
SALOMON SMITH BARNEY INC.,  
MORGAN STANLEY & CO. INC. and  
ERNST & YOUNG LLP,

Defendants.

No. **CIV - 06 - 120 14 LAM**

COMPLAINT FOR VIOLATIONS OF §§11,  
12(a)(2) AND 15 OF THE SECURITIES ACT  
OF 1933, §§10(b), 14(a) AND 20(a) OF THE  
SECURITIES EXCHANGE ACT OF 1934,  
AND STATE SECURITIES AND COMMON  
LAW

DEMAND FOR JURY TRIAL

**THE REMAINDER OF THE  
COMPLAINT IS TOO VOLUMINOUS  
TO SCAN... THE ORIGINAL  
COMPLAINT IS IN THE CASE FILE  
WHICH IS LOCATED IN:**

**THE RECORDS DEPARTMENT  
U.S. DISTRICT COURT  
CLERK'S OFFICE.....**